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Co-Counsel to the WHC Liquidation Trust

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

JEREMY ROSENTHAL, AS LIQUIDATION
 TRUSTEE OF THE WHC LIQUIDATION
 TRUST,

Plaintiff,

v.

HALSEN HOLDINGS, LLC, a California
 limited liability company; SOUTH TEXAS
 ASSOCIATES & RESOURCES, a California
 corporation; PENINSULA HEALTHCARE
 MANAGEMENT LLC, a Nevada limited
 liability company; DANIEL BROTHMAN, an
 individual; EDITH BROTHMAN, an
 individual; STACY SEAN FOWLER, an
 individual; EDMUND C. KING, an
 individual; and DOES 1 through 100,
 inclusive,

Defendants.

Case No. 5:23-cv-06216-PCP

**STIPULATION TO CONTINUE CASE
 MANAGEMENT CONFERENCE &
 [PROPOSED] ORDER**

Date: June 13, 2024

Time: 1:00 p.m.

Courtroom: 8

Judge: P. Casey Pitts

Complaint Filed: December 1, 2023

Trial Date: None

1 Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiff Jeremy Rosenthal, as Liquidation
2 Trustee of the WHC Liquidation Trust (“Plaintiff”) and Defendants Halsen Holdings, LLC, South
3 Texas Associates & Resources, Peninsula Healthcare Management LLC, Daniel Brothman, Edith
4 Brothman, Stacy Sean Fowler, and Edmund C. King (“Defendants”) (collectively, the “Parties”)
5 hereby stipulate and agree as follows:

6 WHEREAS, on December 4, 2024, this Court entered an Initial Scheduling Order (Dkt. 5),
7 scheduling the Initial Case Management Conference (“CMC”) for March 5, 2024;

8 WHEREAS, the date of the CMC was reset by the Court for March 14 following
9 reassignment (Dkt. 14);

10 WHEREAS, on February 5, 2024, the Court granted, as modified, the Parties’ joint request
11 for extension of case management deadlines, setting the CMC to May 16, 2024 (Dkt. 16);

12 WHEREAS, on May 7, 2024, the clerk continued the CMC to June 13, 2024 (Dkt. 27);

13 WHEREAS, there have been no other time modification requests in this case;

14 WHEREAS, the Parties have since scheduled a mediation with Bruce Friedman on
15 August 28, 2024;

16 WHEREAS, in light of the Parties’ scheduled mediation date, the Parties jointly request that
17 the Court continue the CMC to September 5, 2024 or the next available date on the Court’s
18 calendar;

19 WHEREAS, the modifications requested would continue the scheduling for the case to after
20 a mediation has occurred, to allow the Parties to focus on mediation and to conserve the time and
21 resources of the Parties and the Court;

22 WHEREAS, in the event one of the Parties cancels the mediation, the Parties shall seek a
23 Court Order to advance the date of the CMC;

24 WHEREAS, Plaintiff has filed a Declaration in support of this Stipulation as required under
25 Local Rule 6-2(a).

26 **IT IS SO STIPULATED.**
27
28

1 Dated: June 10, 2024

PERKINS COIE LLP

3 By: /s/ Paul S. Jasper

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7 *Counsel to Plaintiff*
Jeremy Rosenthal, as Liquidation
8 *Trustee of the WHC Liquidation Trust*

9 Dated: June 10, 2024

KAUFMAN DOLOWICH, LLP

11 By: /s/ Tad A. Devlin

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16 *Counsel to Defendants*
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17 *Associates & Resources, Peninsula*
Healthcare Management, LLC, Daniel
18 *Brothman, Edith Brothman, Stacy Sean*
Fowler, and Edmund C. King

Attestation Pursuant to Civil Local Rule 5-1(i)(3)

I, Paul S. Jasper, attest that concurrence in the filing of this document has been obtained from any other signatory to this document.

Dated: June 10, 2024

/s/ Paul S. Jasper

Paul S. Jasper, Bar No. 200138

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____, 2024

Hon. P. Casey Pitts

United States District Judge